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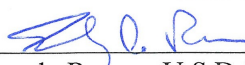
## MEMO ENDORSED

January 22, 2021

### Via ECF

Honorable Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

The application is   x   granted  
                                             denied

  
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Edgardo Ramos, U.S.D.J.  
Dated:   1/22/2021    
New York, New York

Re: *4Internet, LLC v. NYP Holdings, Inc.*, Case 1:21-mc-00004-ER (S.D.N.Y.)  
Joint Request to Adjourn Motion to Compel Discovery from NYP Holdings, Inc.

Dear Judge Ramos:

I am partner at Davis Wright Tremaine LLP, attorneys for NYP Holdings, Inc. (“NYP”), the publisher of the *New York Post*. Currently pending before this Court is a miscellaneous proceeding instituted by 4Internet, LLC (“4Internet”) in which 4Internet seeks to compel NYP, as a third party, to produce documents responsive to a subpoena duces tecum issued by 4Internet in a Nevada federal court action entitled *Robert Miller v. 4Internet, LLC*, Case No. 2:18-cv-JAD-VCF (D. Nev.).

The attorney for 4Internet, Ryan Isenberg, and I are in the process of negotiating a resolution of the motion to compel discovery. We believe that our negotiations will moot the motion to compel or, at the very least, narrow the issues in dispute. Accordingly, to allow us time to see if we can resolve this matter without the need for court intervention, Mr. Isenberg and I jointly request that the time for NYP to oppose the motion be adjourned to **February 12, 2021** and that 4Internet’s time to file any reply on the motion be adjourned to **February 24, 2021**. No prior request for an adjournment of the motion has been made by any party.

We thank the Court for its consideration.

Respectfully,

  
Robert Balin